

**AMY E. POTTER**, OSB No. 231794

[amy@angelilaw.com](mailto:amy@angelilaw.com)

ANGELI LAW GROUP LLC

121 SW Morrison Street, Suite 400

Portland, OR 97204

Telephone: (503) 954-2232

Facsimile: (503) 227-0880

**MICHAEL BERTHOLF**, OSB No. 044642

[michaelbertholaw@gmail.com](mailto:michaelbertholaw@gmail.com)

Law Offices of Michael P Bertholf LLC

108 Mistletoe St

Medford, OR 97501

Telephone: (541) 245-9167

Facsimile: (541) 773-6790

*Attorneys for Defendant*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF OREGON**

**UNITED STATES OF AMERICA**

**1:23-cr-00254-MC**

**v.**

**GOVERNMENT'S EXHIBIT LIST  
WITH COURT RULINGS**

**NEGASI ISHAIAH ZUBERI, aka  
JUSTIN JOSHUA HYCHE, aka SAKIMA  
ZUBERI**

**Defendant.**

This exhibit list has been updated to reflect the Court's rulings on those exhibits during the two pretrial hearings.<sup>1</sup> Both parties have reviewed this filing and concur that it correctly reflects the Court's rulings and exhibits which have, and have not, been admitted.

---

<sup>1</sup> To the extent the Court overruled a defense objection, those objections are preserved for trial and appeal.

<b>Exhibit #</b>	<b>Description</b>	<b>Court Ruling</b>
1.	Map—Washington state	Admitted
2.	Map—Seattle, Washington	Admitted
3.	Maps—Aurora Ave. area	Admitted
4.	Aerial photos—Aurora Ave. area	Admitted
5.	Photos—Aurora Ave. and 109 <sup>th</sup> St.	Admitted
6.	Photos—107 <sup>th</sup> St.	Admitted
7.	Drone video—Aurora Ave. area	Admitted
8.	Diagram—Overhead of Honda Pilot interior	Admitted
9.	Audio—Two 911 calls from July 15, 2023	Not yet admitted (No objection if witness testifies)
10.	Video—Sgt. DuVal’s body camera from July 15, 2023 at KFC in Klamath Falls	Not yet admitted (No objection if witness testifies)
11.	Images—Excerpts from Sgt. DuVal’s body camera at KFC	Admitted
12.	Photos—KFC parking lot	Admitted
13.	Physical exhibit—Springfield XDM pistol	Admitted
14.	Physical exhibit—Magazine and 19 rounds of ammunition from Springfield pistol	Admitted
15.	Image—Excerpt from Sgt. DuVal’s body camera of AV1 at hospital	Admitted
16.	Photos—AV1’s injuries, taken at hospital	Admitted
17.	Images—Excerpts from Ofc. Trippett’s body camera of AV1 at hospital	Admitted
18.	Images—Excerpts from Ofcs. Trippett’s and Gilmore’s body cameras of AV1 at 1336 N Eldorado	Admitted
19.	Photo—One-piece garment	Admitted
20.	Photo—Blue Puma sweatpants	Admitted
21.	Removed	N/A
22.	Photo—Sketch drawn by AV1 of 1336 N Eldorado	Admitted

23.	Maps—Oregon and Klamath Falls area	Admitted
24.	Aerial photo—1336 N Eldorado	Admitted
25.	Photos—Eldorado Ave.	Admitted
26.	Video—Excerpt from Sgt. Fox’s body camera at 1336 N Eldorado	Admitted
27.	Drone video—1336 N Eldorado and area	Admitted
28.	Photos—Front and garage area of 1336 N Eldorado	Admitted
29.	Photos—Rear of 1336 N Eldorado	Admitted
30.	Photos—Fenced area at 1336 N Eldorado	Admitted
31.	Photos—Outside garage side door entryway	Admitted
32.	Photos—Garage side door from inside garage	Admitted
33.	Photo—Garage and cinderblock structure	Admitted
34.	Photo—Cinderblock structure exterior	Admitted
35.	Photos—Cinderblock structure	Admitted
36.	Photos—Interior of cinderblock structure with chair and water bottles	Admitted
37.	Photo—Inside of cinderblock structure looking out	Admitted
38.	Photos—Metal security door and screen	Admitted
39.	Photo—Cinderblock structure showing door damage and blood	Admitted
40.	Photo—White door showing deadbolt	Admitted
41.	Photo—Deadbolt on white door from outside	Admitted
42.	Photo—Deadbolt on white door from inside	Admitted
43.	Photos—Door jamb area damage	Admitted
44.	Photo—Cinderblock structure ceiling	Admitted
45.	Photo—Cinderblock structure side wall	Admitted
46.	Photos—Cinderblock structure floor and stain	Admitted
47.	Removed	N/A

48.	Photos—Metal security door with placard V	Admitted
49.	Photos—Cinderblock structure door jamb with placard W	Admitted
50.	Photos—Cinderblock structure door/foam area, placard X	Admitted
51.	Photos—Outside of fence, placard A	Admitted
52.	Photos—Inside of fence, placards B and C	Admitted
53.	Photo—Garage in front of cinderblock structure	Admitted
54.	Photos—Garage workbench	Admitted
55.	Photos—Cinderblock structure doors with insulation, adhesive, and hanging metal screen	Admitted
56.	Photos—Insulation on exterior door	Admitted
57.	Photo—Cinderblock structure from exterior	Admitted
58.	Photos—Cinderblock structure interior and soundproofing	Admitted
59.	Photo—Cinderblock structure ceiling	Admitted
60.	Photos—Master bedroom and bed	Admitted
61.	Photo—Master bedroom closet and pistol case	Admitted
62.	Photo—Pistol case closeup	Admitted
63.	Photo—Paperwork for Prentice Smith in pistol case	Admitted
64.	Photos—Master bedroom closet with drawers	Admitted
65.	Photo—Firearm barrel and upper receiver	Admitted
66.	Photo—ID in master bedroom closet drawer	Admitted
67.	Photo—Check from Home Depot to Negasi Zuberi	Admitted
68.	Photos—Magazines on floor and bed	Admitted
69.	Photos—Home Depot receipts	Admitted
70.	Photo—Notebook with Prowler trailer folder	Admitted
71.	Photos—Backpack with passport of Negasi Zuberi	Admitted
72.	Photo—Name change decree	Admitted
73.	Photo—Metal ammunition can	Admitted

74.	Photo—Keys in metal ammunition can	Admitted
75.	Photo—Plastic ammunition can	Admitted
76.	Photos—Notepad in holder and contents; Operation Take Over and sketch	Admitted
77.	Photo—Luggage with holster	Admitted
78.	Photo—Master bedroom and seized items on bed	Admitted
79.	Photos—Exterior stairway on right side of house	Admitted
80.	Photo—Exterior window covered and blocks-right side of house	Admitted
81.	Photos—Exterior person doors to garage and house	Admitted
82.	Photo—Person door to garage, blood on doorknob	Admitted
83.	Photo—Person door to garage, view into garage	Admitted
84.	Photo—Garage-left side of garage	Admitted
85.	Photo—Curtain behind cinderblock structure	Admitted
86.	Photos—Purse in garage	Admitted
87.	Photos—Material on top of cinderblock structure	Admitted
88.	Photos—Garage fiberglass and insulation photo	Admitted
89.	Photo—Blue journal with leather cord on bed	Admitted
90.	Photos—Belongings of Prentice Smith in garbage bags	Admitted
91.	Photos—Prentice Smith's passport, mail	Admitted
92.	Videos—Det. Dougherty's body camera from July 15, 2023, at 1336 N Eldorado	Admitted
93.	Diagram—Residence at 1336 N Eldorado	Admitted
94.	Removed	N/A
95.	Diagram—Garage and location of items	Admitted
96.	Removed	N/A
97.	Removed	N/A
98.	Removed	N/A

99.	Physical exhibit—Black notepad holder and notepad with Operation Take Over and drawing	Admitted
100.	Physical exhibit—Springfield pistol case in upstairs bedroom	Admitted
101.	Physical exhibit—Klamath Community College ID	Admitted
102.	Physical exhibit—U.S. passport in name of Justin Hyche	Admitted
103.	Physical exhibit—Blink camera	Admitted
104.	Physical exhibit—Ammunition can, plastic	Admitted
105.	Physical exhibit—Keys from metal ammunition can	Admitted
106.	Physical exhibit—Ammunition can, metal	Admitted
107.	Physical exhibit—Handcuffs in box from upstairs bedroom	Admitted
108.	Physical exhibit—Police patches from upstairs bedroom closet	Admitted
109.	Physical exhibit—Three magazines	Admitted
110.	Physical exhibit—NY driver license—Justin Kouassi	Admitted
111.	Physical exhibit—Leg irons from garage workbench	Admitted
112.	Physical exhibit—Handcuffs from garage workbench	Admitted
113.	Physical exhibit—Key ring from garage workbench	Admitted
114.	Physical exhibit—Key ring from garage workbench	Admitted
115.	Physical exhibit—Purse in garage	Admitted
116.	Physical exhibit—White chair in cinderblock structure	Admitted
117.	Physical exhibit—Black metal door to cinderblock structure	Admitted
118.	Physical exhibit—Fiji water bottle from cinderblock structure	Admitted
119.	Removed	N/A
120.	Physical exhibit—Ammunition on and under workbench	Admitted
121.	Physical exhibit—Doorknob removed from garage door	Admitted
122.	Physical exhibit—Barrel and upper receiver for 6mm rifle	Admitted
123.	Removed	N/A

124.	Removed	N/A
125.	Removed	N/A
126.	Photo—Garage workbench	Admitted
127.	Photo—Deadbolt in box	Admitted
128.	Photo—Loaded curved magazine and three boxes of 7.62 ammunition on workbench	Admitted
129.	Photo—Closeup of magazine and boxes	Admitted
130.	Photo—Box of Remington 9mm Luger ammunition and magazine on workbench	Admitted
131.	Photo—Closeup of Remington ammunition box	Admitted
132.	Photo—New Frontier box	Admitted
133.	Photo—Blazer 9mm Luger ammunition box	Admitted
134.	Photo—Ammunition box under garage workbench	Admitted
135.	Photo—Closeup of Blazer ammunition box and bullets	Admitted
136.	Photo—Drill bit and parts	Admitted
137.	Photo—AR-15 lower parts kit	Admitted
138.	Photo—AR-15 lower drill instructions	Admitted
139.	Photo—AR-15 lower on garage floor	Admitted
140.	Photo—AR-15 lower closeup	Admitted
141.	Photo—USPS box to Negasi Zuberi	Admitted
142.	Photo—Contents of USPS box-5D Tactical	Admitted
143.	Photo—Firearm component in 5D Tactical box	Admitted
144.	Photo—Master bedroom drawer, left side of bed	Admitted
145.	Removed	N/A
146.	Removed	N/A
147.	Photo—Master bedroom drawer, right side of bed	Admitted
148.	Photo—Closeup of right side drawer	Admitted

149.	Photo—Blue journal with leather cord on bed	Admitted
150.	Photo—Targets list and other writing from blue journal	Admitted
151.	Removed	N/A
152.	Photo—Desktop computer and camera	Admitted
153.	Removed	N/A
154.	Photo—Camera below television	Admitted
155.	Photo—48 Laws of Power and The Art of War books	Admitted
156.	Photo—Back side of cinderblock structure	Admitted
157.	Photo—Financial cards in name of Negasi Zuberi and Justin Kouassi	Admitted
158.	Photo—Inside of cinderblock structure, right side of door	Admitted
159.	Photo—Inside of cinderblock structure, right side of door, sheetrock removed	Admitted
160.	Photo—Inside of cinderblock structure, right side of door, insulation removed	Admitted
161.	Photo—Inside of cinderblock structure, left side of door, sheetrock removed	Admitted
162.	Photo—Inside of cinderblock structure, left side of door, insulation removed	Admitted
163.	Videos—Four videos of SA Gluesenkamp walking through the residence on July 19, 2023	Admitted
164.	Images—House interior layout and exterior excerpts from SA Gluesenkamp's videos	Admitted
165.	Physical exhibit—Drywall from cinderblock structure	Admitted
166.	Physical exhibit—8 rounds of 9mm Blazer ammunition	Admitted
167.	Physical exhibit—3 boxes of Wolf 7.62 ammunition	Admitted
168.	Physical exhibit—Blue journal with leather cord and Targets list	Admitted
169.	Physical exhibit—25 round 6mm magazine	Admitted
170.	Physical exhibit—7.62 magazine	Admitted
171.	Physical exhibit—29 rounds of 7.62 ammunition	Admitted



172.	Physical exhibit—Two 6mm magazines	Admitted
173.	Physical exhibit—30 rounds of Hornady 6mm ammunition	Admitted
174.	Physical exhibit—Box of Remington 9mm ammunition	Admitted
175.	Physical exhibit—Deadbolt in box addressed to Sakima Zuberi	Admitted
176.	Map—Oregon and Nevada	Admitted
177.	Map—Reno area	Admitted
178.	Map—Reno Walmart	Admitted
179.	Images—Surveillance video excerpts Walmart in Reno	Admitted
180.	Video—Excerpt from Officer Albert’s patrol car camera from Reno	Admitted
181.	Video— Excerpts from Officer Staples’ body camera from Reno	Admitted
182.	Video—Excerpts from Officer Broadway’s body camera from Reno	Admitted
183.	Video—Excerpts from TFO Griebel’s body camera from Reno	Admitted
184.	Images—Excerpts from videos of traffic stop of Negasi Zuberi in Reno	Admitted
185.	Images—Excerpts from patrol car showing Negasi Zuberi in Walmart parking lot and with foot out	Admitted
186.	Images—Excerpts from patrol car showing Negasi Zuberi being arrested	Admitted
187.	Removed	N/A
188.	Removed	N/A
189.	Photos of exterior of Honda Pilot in Reno	Admitted
190.	Photos of blood and knife inside Honda Pilot	Admitted
191.	Image—Closeup of Negasi Zuberi’s face from body camera in Reno, NV	Admitted
192.	Transcript—Transcripts embedded in excerpts of Officers Broadway’s, Staples’, and Griebel’s body camera videos	Admitted
193.	Photos—Honda Pilot	Admitted

194.	Photos—Interior of Pilot, driver and front passenger area	Admitted
195.	Photos—Honda Pilot interior middle row area	Admitted
196.	Photo—Honda Pilot rear passenger seat	Admitted
197.	Removed	N/A
198.	Photos—Cell phone case found in Pilot and contents	Admitted
199.	Photos—Garmin GPS device found in Pilot	Admitted
200.	Photos—Pilot dash area and Loves receipt	Admitted
201.	Photos—Safeway receipt from July 14, 2023 found in Pilot	Admitted
202.	Photos—Home Depot receipt found in Pilot	Admitted
203.	Photos—Pilot ceiling sunglass pocket and vehicle registration papers	Admitted
204.	Photos—Pilot ceiling sunglass pocket and handcuff key	Admitted
205.	Photos—Pilot center console and RV Sales card and LandAirSea shipping receipt from console	Admitted
206.	Photos—Pilot console and 9mm bullet from console	Admitted
207.	Photos—Pilot door pocket and Dollar Tree receipt from July 15, 2023, for bleach and paper towels	Admitted
208.	Photo—Black backpack found in Pilot	Admitted
209.	Photos—Tire spikes found in backpack from Pilot	Admitted
210.	Photos—Negasi Zuberi's U.S. passport; Social Security card, name change paperwork and New York Driver License in name of Justin Kouassi	Admitted
211.	Photos—MacBook laptop from backpack found in Pilot	Admitted
212.	Photos—Contents of brown bag from Pilot with two cell phones, clothes, flashlight, binoculars and zip ties	Admitted
213.	Photos—Flashlight, binoculars and zip ties from brown bag from Pilot	Admitted
214.	Photos—Rear seat pocket and receipts from Pilot	Admitted
215.	Photos—Papers and aluminum foil on floor of Pilot	Admitted
216.	Photo—Cody's Repair receipt from July 10, 2023	Admitted

217.	Photo—July 7, 2023, Aurora Ave. Safeway receipt from Pilot	Admitted
218.	Photo—Keys from Pilot	Admitted
219.	Photos—Dreamgirls at Rick receipt from July 7, 2023	Admitted
220.	Photos—Pilot center console area	Admitted
221.	Photos—Clothes in front passenger area of Pilot	Admitted
222.	Photo—Wine bottle in front passenger area of Pilot	Admitted
223.	Photos—Pilot middle row area and bleach cleaner	Admitted
224.	Photos—9mm casing in Pilot	Admitted
225.	Photos—Condom wrapper in Pilot	Admitted
226.	Removed	N/A
227.	Photos—Home Depot receipt from June 30, 2023 from Pilot	Admitted
228.	Photos—Aluminum foil from Pilot	Admitted
229.	Removed	N/A
230.	Photo—Charcoal toothpaste	Admitted
231.	Photos—Fiji water bottles	Admitted
232.	Photo—Sportsman’s Warehouse receipt	Admitted
233.	Removed	N/A
234.	Removed	N/A
235.	Physical exhibit—Negasi Zuberi’s cell phone and cover	Admitted
236.	Physical exhibit—Negasi Zuberi’s cell phone case and contents	Admitted
237.	Physical exhibit—AV1’s cell phone	Admitted
238.	Physical exhibit—Garmin GPS device	Admitted
239.	Physical exhibit—Handcuff key from overhead sunglasses compartment in Pilot	Admitted
240.	Physical exhibit—Key chain with handcuff key	Admitted
241.	Physical exhibit—Spent 9mm casing	Admitted

242.	Physical exhibit—9mm bullet	Admitted
243.	Physical exhibit—Dollar Tree receipt	Admitted
244.	Removed	N/A
245.	Physical exhibit— Negasi Zuberi’s U.S. passport; Social Security card and New York Driver License in name of Justin Kouassi	Admitted
246.	Removed	N/A
247.	Physical exhibit—Bleach cleaner bottle	Admitted
248.	Physical exhibit—Aluminum foil	Admitted
249.	Physical exhibit—Home Depot and shipping receipts	Admitted
250.	Removed	N/A
251.	Physical exhibit—Alycia Westfall’s cell phone	Admitted
252.	Physical exhibit—Brown bag and contents	Admitted
253.	Physical exhibit—Bag with JC Penny’s receipt and clothing	Admitted
254.	Physical exhibit—Aluminum foil (x2)	Admitted
255.	Physical exhibit—Love’s receipt	Admitted
256.	Removed	N/A
257.	Video—Surveillance video from Portland, OR Safeway on July 14, 2023	Admitted
258.	Images—Excerpts from surveillance video from Portland, OR Safeway on July 14, 2023	Admitted
259.	Video—Surveillance video from Woodland, WA, Safeway on July 14, 2023	Admitted
260.	Images—Excerpts from surveillance video from Woodland, WA, Safeway on July 14, 2023	Admitted
261.	Video—Surveillance video from Klamath Falls Love’s gas station on July 15, 2023	Admitted
262.	Images—Excerpts from surveillance video from Klamath Falls Love’s gas station on July 15, 2023	Admitted
263.	Videos—Negasi Zuberi and Honda Pilot in Tulelake, CA	Admitted
264.	Removed	N/A

265.	Removed	N/A
266.	Location data—LandAirSea data for Negasi Zuberi	Admitted
267.	Location data—Garmin data for the Honda Pilot and Negasi Zuberi from July 15, 2023 at 3:40:02	Admitted
268.	Location data—Cell phone handset data from Alycia Westfall's cell phone	Admitted
269.	Phone records—T-Mobile toll records for Negasi Zuberi	Admitted
270.	Digital file—CAST report from SA Kennedy regarding location data	Not yet admitted (No objection if expert testifies)
271.	Removed	N/A
272.	Photo—Hampton Landing area, Oregon	Admitted
273.	Photo—Shell Station, Halsey, Oregon	Admitted
274.	Map—Merrill Gas Station & Convenience Store	Admitted
275.	Images—Surveillance video excerpts Merrill Gas Station & Convenience Store	Admitted
276.	Surveillance Video—Merrill Gas Station & Convenience Store (July 16, 2023)	Admitted
277.	Photo—Nissan Altima	Admitted
278.	Photos—Home Depot receipt in Altima driver door pocket	Admitted
279.	Photos—AAA Discount storage paperwork and receipt	Admitted
280.	Photos—Home Depot receipt in Altima passenger door pocket	Admitted
281.	Photo—Home Depot receipt	Admitted
282.	Photo—Concrete anchors	Admitted
283.	Photo—Honda paperwork and receipts	Admitted
284.	Physical exhibit—AAA Discount Storage paperwork and receipt	Admitted
285.	Physical exhibits—Home Depot receipts and return paperwork	Admitted
286.	Physical exhibit—Concrete anchors	Admitted

287.	Aerial photos—AAA Discount Storage and Home Depot area	Admitted
288.	Photos—Exterior of AAA Discount Storage	Admitted
289.	Photos—Inside AAA Discount Storage around area of Prowler trailer	Admitted
290.	Photos—Exterior of trailer	Admitted
291.	Photos—Trailer with door open	Admitted
292.	Photo—Taser, magazine and laptop inside trailer	Admitted
293.	Video—Interior of trailer	Admitted
294.	Photo—Pile of items by door	Admitted
295.	Photo—Back to front of trailer	Admitted
296.	Photo—Back of trailer	Admitted
297.	Photo—Front of trailer	Admitted
298.	Photo—Back and door area of trailer	Admitted
299.	Photo—Side of trailer bathroom	Admitted
300.	Photo—Trailer bathroom mirror	Admitted
301.	Photo—Negasi Zuberi and Alycia Westfall	Admitted
302.	Photos—Name change paperwork	Admitted
303.	Photo—Plastic bag in trailer with used condoms	Admitted
304.	Photo—Bedding and cell phone jammer spike in trailer	Admitted
305.	Photo—Shotgun inside blanket in trailer	Admitted
306.	Photo—Shotgun in trailer	Admitted
307.	Photo—Shotgun and shotgun shell in trailer	Admitted
308.	Photo—Cell phone jammers on floor of trailer	Admitted
309.	Photo—Rifle in case on trailer bed	Admitted
310.	Photo—Trailer shelf	Admitted
311.	Photo—Aluminum foil and tape in trailer	Admitted

312.	Photos—Taser outside	Admitted
313.	Photo—Silver and black handcuffs outside	Admitted
314.	Photo—Backpack, cell phone jammers and handcuffs outside	Admitted
315.	Photo—Backpack inside with cell phone jammers, gloves, handcuffs and beanie	Admitted
316.	Photos—Cell phone jammers	Admitted
317.	Photos—Plug in electronic device	Admitted
318.	Photos—Pistol holsters	Admitted
319.	Photos—AM-15 rifle	Admitted
320.	Photos—Remington rifle	Admitted
321.	Photos—Stoeger shotgun	Admitted
322.	Photos—Pistol magazines and ammunition	Admitted
323.	Photos—Rifle magazine and ammunition	Admitted
324.	Photo—Two shotgun shells	Admitted
325.	Photo—Charcoal toothpaste	Admitted
326.	Photo—Remington rifle box flap and receipts	Admitted
327.	Photo—Shipping label to Prentice Smith	Admitted
328.	Physical exhibit—AR-15 style rifle	Admitted
329.	Physical exhibit—Remington .308 rifle	Admitted
330.	Physical exhibit—Stoeger 12 GA shotgun	Admitted
331.	Physical exhibit—Magazines	Admitted
332.	Physical exhibit—Pistol holsters	Admitted
333.	Physical exhibit— Mesh backpack with gloves, beanie, handcuffs, antennas	Admitted
334.	Physical exhibit—Taser and cartridges	Admitted
335.	Physical exhibit—Black pair of handcuffs	Admitted
336.	Physical exhibit—Silver pair of handcuffs	Admitted

337.	Physical exhibit—12 GA ammunition	Admitted
338.	Physical exhibit—9mm ammunition	Admitted
339.	Physical exhibit—5.56 ammunition	Admitted
340.	Physical exhibit—Cell phone jammer-16 antenna	Admitted
341.	Physical exhibit—Cell phone jammer-8 antenna	Admitted
342.	Physical exhibit—Paperwork for firearms and accessories	Admitted
343.	Physical exhibit—Plug in electronic device	Admitted
344.	Removed	N/A
345.	Removed	N/A
346.	Removed	N/A
347.	Financial records—Key Bank	Admitted
348.	Financial records—Bank records from May 6, 2023, withdrawal of \$300	Admitted
349.	Online purchases—Amazon records	Admitted
350.	Online purchases—Excerpt of Amazon records	Admitted
351.	Surveillance Video—Home Depot and still shots from the video (May 17, 2023 to July 2, 2023)	Not yet admitted (No objection if witness explains timestamps)
352.	Documents—Receipts received from Home Depot	Admitted
353.	Photos—FBI Documenting cinderblock structure	Admitted
354.	Photos—Cinderblock structure measuring and construction, from iCloud account	Admitted
355.	Photos—Cinderblock structure deconstruction	Admitted
356.	Documents—Notes from garage clean up	Not yet admitted (No objection if witness testifies)
357.	Documents—Klamath Falls landfill receipts	Admitted
358.	Video—Blink camera video of Alycia Westfall leaving, May 5, 2023	Admitted
359.	Image—Screenshot from video of Alycia Westfall leaving	Admitted



360.	Video—Blink camera video of Negasi Zuberi in kitchen, May 5, 2023 at 7:55 p.m.	Admitted
361.	Image—Screenshot from video of Negasi Zuberi in kitchen	Admitted
362.	Videos—Blink camera videos of Negasi Zuberi in kitchen, May 5, 2023 at 11:01 and 11:04 p.m.	Admitted
363.	Image—Screenshot from video of Negasi Zuberi leaving kitchen	Admitted
364.	Video—Blink camera video of male in kitchen talking on phone, May 6, 2023 at 12:58 a.m.	Not yet admitted (No objection if witness who is in video testifying to its contents)
365.	Videos—Blink camera videos of Negasi Zuberi in kitchen then walking towards garage with blanket, May 6, 2023 at 2:28 and 2:29 a.m.	Admitted
366.	Images—Screenshots from video of Negasi Zuberi in kitchen and walking towards garage	Admitted
367.	Videos—Blink camera videos of Zuberi holding a pistol, May 7, 2023	Admitted
368.	Images—Screenshots from May 7, 2023 kitchen videos	Admitted
369.	Videos—Blink camera videos of Alycia Westfall and Negasi Zuberi talking in kitchen, May 7, 2023	Admitted
370.	Video—Blink camera video of Negasi Zuberi holding a firearm part	Admitted
371.	Image—Screenshot from video of Negasi Zuberi holding a firearm part	Admitted
372.	Image—Screenshot from video of Negasi Zuberi holding a firearm upstairs	Admitted
373.	Removed	N/A *Objection was sustained to proposed exhibit*
374.	Messages-Negasi Zuberi and Alycia Westfall on July 15, 2023 regarding meeting	Admitted
375.	Messages-Negasi Zuberi and Alycia Westfall on July 16, 2023 regarding Merrill address	Admitted
376.	Removed	N/A

377.	Messages—Negasi Zuberi asking about acquiring taser, September 1, 2022	Admitted
378.	Removed	N/A
379.	Messages—Negasi Zuberi asking Tyler Archibald about constructing an underground concrete block structure	Admitted
380.	Messages—Negasi Zuberi asking Tyler Archibald about what material is used for jail floors	Admitted
381.	Message—Negasi Zuberi sending Tyler Archibald an image of a cell phone jammers, December 28, 2022	Admitted
382.	Messages—Negasi Zuberi asking Tyler Archibald about building a block structure that a person can't break with their hands	Admitted
383.	Message—Negasi Zuberi telling Tyler Archibald that he has a pistol and including a picture	Admitted
384.	Message—Negasi Zuberi discussing trading firearms with a family member, and sending a picture of firearms	Admitted
385.	Video—Negasi Zuberi holding a pistol, from iCloud, November 28, 2022	Admitted
386.	Video—Negasi Zuberi with pistol, from iCloud	Admitted
387.	Video—Negasi Zuberi with pistol, from iCloud	Admitted
388.	Video—Negasi Zuberi saying and showing that he has an RV, Nov. 6, 2022	Admitted
389.	Removed	N/A
390.	Video—Negasi Zuberi saying that he has the Honda back, from iCloud, June 27, 2023,	Admitted
391.	Images—Screenshot of Dayton Tactical order for 80% AR-15 lower receiver from iCloud, October 22, 2022	Admitted
392.	Photos—Prowler trailer from iCloud account, November 15, 2022	Admitted
393.	Photo—Remington .308 rifle box label from iCloud account, November 17, 2022	Admitted
394.	Image—Screenshot from iCloud account of 32 round magazine for XD(M) 9mm from PistolGear, December 7, 2022	Admitted
395.	Photo—Springfield pistol on The Art of War book, from iCloud account, December 21, 2022	Admitted

396.	Removed	N/A  *Objection was sustained to original objection*
397.	Photo—AAA Discount Storage paperwork from iCloud account, January 24, 2023	Admitted
398.	Image—Screenshot of cell phone jammer, from iCloud	Admitted
399.	Image—Screenshot of XDM pistol conversion kit, from Negasi Zuberi's iPhone, March 29, 2023	Admitted
400.	Photo—Firearms on bed, sent via message by Negasi Zuberi, March 29, 2023	Admitted
401.	Image—Screenshot of Google Maps use on iPhone, from iCloud account, May 6, 2023 at 1:20 a.m.	Admitted
402.	Digital files—Creation of contact in Negasi Zuberi's phone for Girl from Pikey	Admitted
403.	Image—Screenshot of payment to AAA Discount Storage by Negasi Zuberi, June 19, 2023	Admitted
404.	Digital file—Browser history from MacBook	Admitted
405.	Photo—Negasi Zuberi crying in Pilot in Reno, July 16, 2023, child's face redacted	Admitted
406.	Removed	N/A  *Objection to original exhibit sustained*
407.	Photo—Tulelake, from iCloud, July 15, 2023	Admitted
408.	Photos—Taken from Honda Pilot in Reno on July 16, 2023	Admitted
409.	Photos—The Pikey exterior	Admitted
410.	Photos—The Pikey interior	Admitted
411.	Photo—AV2 and friends at The Pikey on May 5, 2023	Admitted
412.	Photos—AV2 and friend at The Pikey on May 5, 2023	Admitted
413.	Videos—AV2 and friend at The Pikey on May 5, 2023	Admitted
414.	Image—Screenshot of Negasi Zuberi's Instagram taken by AV2	Admitted

415.	Video—Negasi Zuberi at The Pikey talking to male at pool table on May 6, 2023	Admitted
416.	Video—Negasi Zuberi leaving The Pikey with male and female on May 6, 2023, at 12:53 a.m.	Admitted
417.	Video—Negasi Zuberi walking up outside of The Pikey and leaving at the same time as AV2; May 6, 2023	Admitted
418.	Images—Screenshots from surveillance video of Negasi Zuberi in and outside of The Pikey	Admitted
419.	Removed	N/A
420.	Photo—Sketch of rural area by AV2	Admitted
421.	Photo—Sketch of garage by AV2	Admitted
422.	Photos—Chase Bank in Klamath Falls	Admitted
423.	Photos—AV2’s former street and residence	Admitted
424.	Removed	N/A
425.	Photo—Clothes AV2 was wearing on May 5-6, 2023	Admitted
426.	Photos—Injury to AV2’s face	Admitted
427.	Video—Injury to AV2’s face	Admitted
428.	Image—Excerpt from video of Injury to AV2’s face	Admitted
429.	Video—Excerpt from AV2 in interview room with KFPD and FBI on July 17, 2023	Not yet admitted (Objection – will wait for witness to testify)
430.	Removed	N/A
431.	Removed	N/A
432.	Removed	N/A
433.	Removed	N/A
434.	Photos—HS Produkt Springfield XDM 9x19mm pistol	Admitted
435.	Removed	N/A
436.	Photos—Anderson Manufacturing, Model AM-15, multi-caliber rifle	Admitted
437.	Removed	N/A

438.	Photos—Firearm & Ammunition from Pilot (Count 4)	Admitted
439.	Photos—Firearms & Ammunition from trailer (Count 5)	Admitted
440.	Photos—Ammunition from bedroom (Count 6)	Admitted
441.	Photos—Ammunition from garage (Count 7)	Admitted
442.	Documents—Ammunition Storage components	Admitted
443.	Removed	N/A
444.	Documents—Limitless receipt	Admitted
445.	Documents—Sportsman’s Warehouse Klamath Falls	Admitted
446.	Removed	N/A
447.	Removed	N/A
448.	Removed	N/A
449.	Removed	N/A
450.	Video—Demonstration of TASER Pulse	Not yet admitted (No objection if expert testifies)
451.	Document—Item 107-1 from Item 107-Blue notebook from Rachel Clay’s file	Admitted
452.	Documents—Item 109-Notepad from 1336 North Eldorado Avenue from Rachel Clay’s file	Admitted
453.	Documents—Item 114-Court documents as known writing sample from Rachel Clay’s file	Admitted
454.	Documents—Item 115-Questioned Documents Secondary Evidence (5 electrostatic lifts) from Rachel Clay’s file	Admitted
455.	Video—Demonstration of Cell Phone Jammers by Shelby Quick (eight antennas)	Admitted
456.	Video—Demonstration of Cell Phone Jammers by Shelby Quick (sixteen antennas)	Admitted
457.	Documents—Negasi Zuberi’s prints from Stephanie Stewart’s file	Admitted
458.	Images—Prints from plastic bag from trailer at 2625 Unity Street (Item 8) from Stephanie Stewart’s file	Admitted

459.	Images—Prints from notepad holder with notepad from 1336 North Eldorado Avenue and one page (Items 109 & 109-1) from Stephanie Stewart's file	Admitted
460.	Removed	N/A
461.	Audio recording—Negasi Zuberi and Alycia Westfall on July 23, 2023	Admitted
462.	Audio recording—Negasi Zuberi and Alycia Westfall on July 28, 2023	Admitted
463.	Audio recording—Negasi Zuberi and Alycia Westfall on July 28, 2023	Admitted
464.	Removed	N/A
465.	Audio recording—Negasi Zuberi and Alycia Westfall on August 1, 2023 at 9:36 p.m.	Admitted
466.	Audio recording—Negasi Zuberi and Alycia Westfall on June 24, 2024 at 11:17 a.m.	Admitted
467.	Transcripts—Transcripts embedded in excerpts of audio recordings of Negasi Zuberi	Admitted
468.	Emails—Negasi Zuberi and Alycia Westfall, July 21, 2023	Admitted
469.	Removed	N/A
470.	Emails—Negasi Zuberi and Alycia Westfall, July 27, 2023	Admitted
471.	Emails—Negasi Zuberi and Alycia Westfall, July 28, 2023	Admitted
472.	Photo – AV1	Admitted
473.	Documents—AAA Discount Storage Ledger and Rental Agreement	Admitted
474.	Document—Rental Agreement for 1336 N Eldorado	Admitted
475.	Videos—AV2 on May 6, 2023	Admitted
476.	Images—Excerpts from AV2's May 6, 2023 videos	Admitted
477.	Messages—Negasi Zuberi and Brenden Westfall regarding rent	Admitted
478.	Messages—Negasi Zuberi and Bradley Sticklin regarding wi-fi password	Admitted
479.	Photos—Aurora Ave. at night	Admitted
480.	Removed	N/A

481.	Photo—Maverick Motel in Klamath Falls	Admitted
482.	Image—Screenshot of Honda Pilot in Tulelake	Admitted
483.	Photos—Tulelake, California	Admitted
484.	Map—Klamath Falls, Merrill, and Tulelake	Admitted
485.	Photos—SANE exam of AV1	Not yet admitted (No objection if witness testifies)
486.	Photos—Handcuffs and leg iron	Admitted
487.	Photos—White streak marks in interior of Honda Pilot	Not yet admitted (Objection - hold for testimony)
488.	Image—Screenshot of Alycia Westfall on July 15, 2023	Admitted
489.	Removed	N/A
490.	Photo—LandAirSea trackers	Admitted
491.	Physical exhibit—LandAirSea trackers	Admitted
492.	Photos—Taser and cartridges	Admitted
493.	Photos—FBI lab—Blue Puma sweatpants, used condom, handcuffs, one-piece garment and guns	Admitted
494.	Document—Declaration of Jeff Byram	Admitted
495.	Photos—1336 N Eldorado prior to being rented by Negasi Zuberi	Admitted
496.	Photos—Neighbor's house next to 1336 N Eldorado	Admitted
497.	Removed	N/A
498.	Document—Rachel Clay's handwriting presentation	Not yet admitted (No objection if expert testifies)
499.	Audio recording—Negasi Zuberi on June 22, 2024	Admitted
500.	Transcript—Audio recording on June 22, 2024	Admitted
501.	Document—Diagram of location of items in Honda pilot	Admitted

502.	Document—Diagram by Kori Barnum of 1336 Eldorado garage	Not yet admitted (No objection if witness testifies)
503.	Document—Compilation of photos of AV1	Not yet admitted (No objection if witness testifies)
504.	Document—Compilation of photos of AV2	Admitted
505.	Document—Compilation of photos of cinderblock structure	Admitted
506.	Document—Compilation of photos of writings	Admitted
507.	Document—Chart of DNA analysis—Items from 1336 Eldorado	Not yet admitted (No objection if expert testifies)
508.	Document—Chart of DNA analysis—Items from garage	Not yet admitted (No objection if expert testifies)
509.	Document—Chart of DNA analysis—Items from trailer	Not yet admitted (No objection if expert testifies)
510.	Document—Timeline of 2023 activity	Admitted
511.	Document—Timeline of July 15/16, 2023 activity	Admitted
512.	Document—Map of May 6, 2023 travel	Admitted
513.	Document—Map of Klamath Falls locations	Admitted
514.	Document—Map of July 12-14, 2023 travel	Admitted
515.	Document—Map of July 14/15, 2023 travel	Admitted
516.	Document—PowerPoint of Garmin and Alycia Westfall cell phone location data	Admitted
517.	Transcript—911 call by Mellissa Geary on July 15, 2023	Admitted
518.	Document—Compilation of photos of seized items	Admitted
519.	Photo—Purse on fence at 1336 N Eldorado	Not yet admitted (No objection if witness testifies)
520.	Images—Mapping of Klamath Falls routes using Google Maps	Admitted



521.	Photos—Taken from area of location 4 on Ex. 512	Admitted
522.	Photos and Image—Area of location 2 on Ex. 512	Admitted
523.	Photos—Taken from area of location 3 on Ex. 512	Admitted
524.	Photos—Taken from area of location 6 on Ex. 512	Admitted

DATED October 6, 2024

Respectfully submitted,

s/ Amy E. Potter

Amy E. Potter

121 SW Morrison Street, Suite 400

Portland, OR 97204

Telephone: (503) 954-2232

*Attorney for Defendant*

NATALIE K. WIGHT

United States Attorney

s/ Jeffrey S. Sweet (with permission)

JEFFREY S. SWEET

NATHAN J. LICHVARCIK

MARCO A. BOCCATO

Assistant United States Attorneys